

[REDACTED]

**Subject:** [EXTERNAL EMAIL] Network Rail comments in relation to Dudley Local Plan Review

[REDACTED]

[REDACTED]

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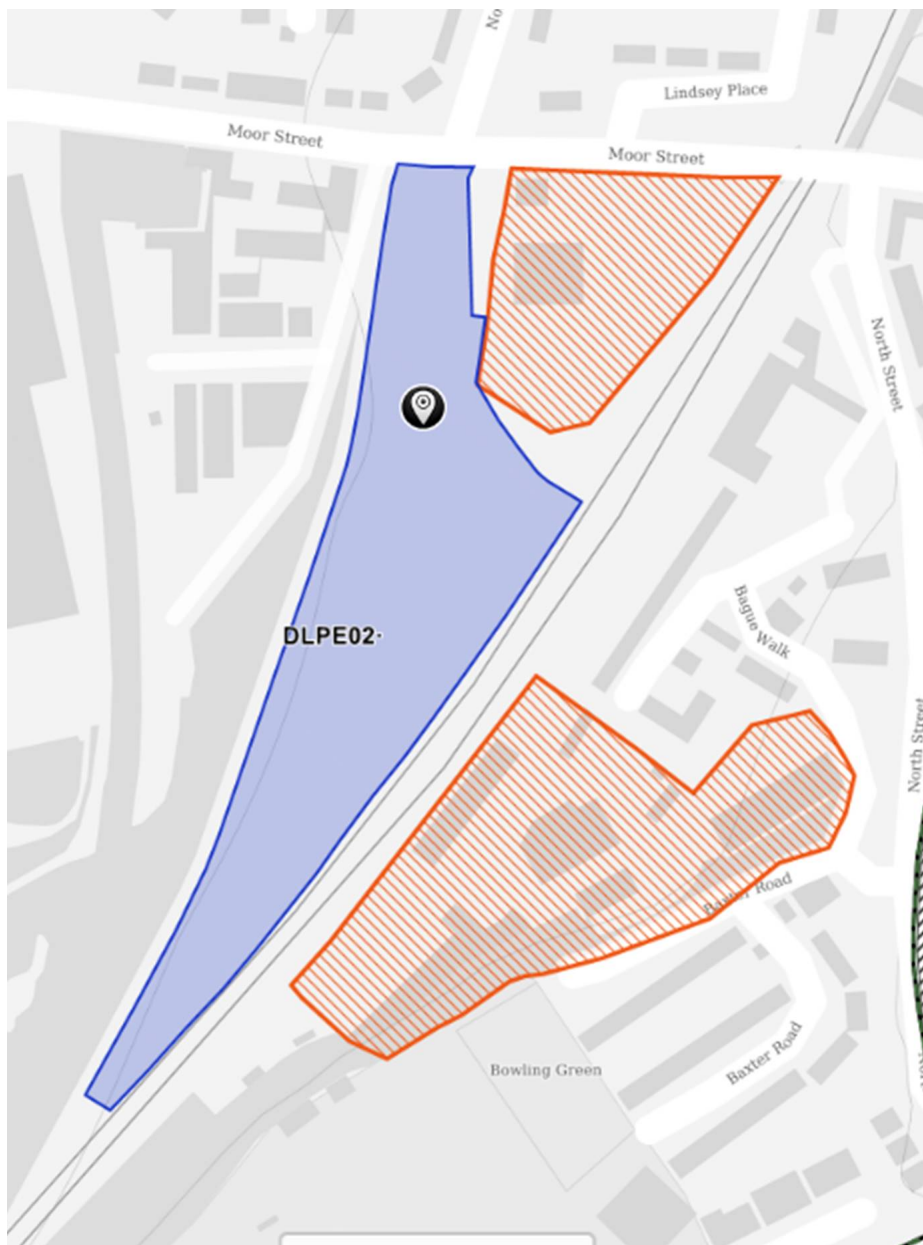
OFFICIAL

Dear Sir or Madam,

Network Rail has reviewed the Dudley Local Plan Review consultation draft and wishes to submit the following comments:

Network Rail has undertaken an options appraisal on the 3.74 hectare brownfield site at Moor Street, Brierley Hill and believes the site has the potential for residential-led development, in accordance with the Draft Black Country Plan, which states that Brierley Hill will benefit from 'identification of sites for a significant increase in new housing'.

It is noted that the review document proposes an employment use for Network Rail's land (blue shaded area below), with a continued resi allocation for the orange hatched area outside of NR ownership.



Whilst it is currently designated employment land and it is noted that the Brierley Hill Area Action Plan, adopted in 2011, that there was a call for freight terminals to be brought back into use, the constraints on the surrounding highways network have prevented any viable freight scheme from coming to fruition, with the site ceasing its principal operations in 2006 and being dormant since 2012.

Network Rail has previously attempted to bring the site back into industrial use with a planning application for an energy from waste facility which was refused in 2013 (Planning reference: P12/1287) which was refused, and the decision held on appeal, with a further re-submitted plan (Planning reference: P14/1265) being withdrawn in 2014 following a further recommendation for refusal.

It is further noted that the AAP is due to be superseded by the Brierley Hill Plan in 2024, where the issues and options report outlines that vacant brownfield sites have the potential to address the need for the supply of 3,000 new homes that need to be built in Brierley Hill, and Northmoor Industrial Estate on Moor Street is specifically mentioned as a potential housing growth area, given the area's now primarily residential nature and redevelopment of the Network Rail's former freight terminal in favour of a residential-led development would be appropriate in that context.

Presumption in favour of brownfield industrial redevelopment for residential has also been established in the Moor Street area, on the immediately adjacent site to the North of the former terminal, known as the Brian Hill site, which was given outline planning consent for the erection of 94 flats in 2017, which adds further weight to a residential-led redevelopment scheme.

An options appraisal undertaken on the site revealed potential to deliver 98 new homes as follows:

Unit type	Bedrooms	Number of units	Area per unit sqm	Area per unit sqft	Total area sqft
Maisonette	1B2P	8	50	538	4,304
House	1B2P	13	58	624	8,112
Bungalow	2B3P	6	70	753	4,518
House	2B4P	28	79	850	23,800
House	3B5P	39	93	1,001	39,039
House	4B6P	4	106	1,141	4,564
<b>Overall Total/Average</b>		<b>98</b>	<b>80</b>	<b>861</b>	<b>84,337</b>

Network Rail would like to collaborate with the council to ensure that the most optimal land use is found for the site. With this in mind, we would be happy to discuss the opportunity for a future residential use. A Teams meeting to discuss would be welcomed – it would be appreciated if you are able to share some dates/times that would be suitable for this.

Please let me know if there is any additional information that you require at this stage.

Kind regards,



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**NetworkRail**



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